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HONORABLE CHRISTOPHER M. ALSTON

HEARING DATE: May 21, 2025  
HEARING TIME: 9:30 a.m.  
LOCATION: Zoomgov  
RESPONSE DUE: May 15, 2025

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re

Chapter 7

CRAIG CLINTON ROMINGER and HEIDI KAY  
ROMINGER,

No. 24-11790-CMA

Debtors.

JONATHAN ROBERTS, an individual,

Adversary Case No. 24-01085-CMA

Plaintiff,

v.

PLAINTIFF'S RESPONSE TO MOTION  
FOR JUDICIAL NOTICE OF PRIVILEGE  
WAIVER AND NOTICE OF REQUEST  
FOR PRODUCTION OF DOCUMENTS

CRAIG CLINTON ROMINGER and HEIDI KAY  
ROMINGER,

Defendants.

Jonathan Roberts ("Plaintiff"), plaintiff in the above-captioned adversary proceeding (the "Adversary Proceeding") responds to Defendants' Motion for Judicial Notice of Privilege Waiver and Notice of Request for Production of Documents.

First, neither of the two emails submitted by Defendants (ECF 24-1 and 24-2) implicate the attorney client privilege. The first (ECF 24-1) is an email among the undersigned, Plaintiff, and a third party. The second (ECF 24-2) is an email from Defendant Craig Rominger to the undersigned.

PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR  
JUDICIAL NOTICE OF PRIVILEGE WAIVER – Page 1

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1 Second, to the extent Defendants seek the production of documents, they are required to use  
2 the procedures in Federal Rule of Bankruptcy Procedure 7034. Plaintiff notes that the documents  
3 requested are wholly outside of the scope of the Adversary Proceeding and reserve any objections in  
4 that regard should discovery be properly issued.

5 DATED this 15<sup>th</sup> day of May, 2025.

6 BUSH KORNFIELD LLP

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8 By /s/ Christine M. Tobin-Presser  
Christine M. Tobin-Presser, WSBA #27628  
9 Attorneys for Plaintiff Jonathan Roberts  
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